

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

CRIMINAL NO. 05-CR-10164-GAO

GUILLERMO FREDERICO VASCO

JOINT MOTION FOR EXCLUDABLE DELAY
FOR THE PERIOD JANUARY 20 THROUGH MARCH 28, 2006

The parties respectfully request the Court to exclude the period of January 20 through March 28, 2006, under the Speedy Trial Act and state the following in support of this request:

1. At a status conference on March 1, 2006¹, defense counsel advised the Court that he was awaiting a ruling on his request for funds to hire someone to translate various documents seized from the defendant's jail cell and needed additional time to then review those documents.
2. The Court scheduled a further status conference for March 28, 2006, and defense counsel orally agreed that the time until the next status conference should be excluded.

¹A status conference scheduled for 1/20/06 was continued to 3/1/06 on joint motion of the parties, who agreed that this period also should be excluded under the Speedy Trial Act.

WHEREFORE, the parties request that the period of January 20, 2006, through March 28, 2006, be excluded in that the ends of justice served by doing so outweigh the best interests of the public and the defendant in a speedy trial.

Respectfully submitted,

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Dated: 3/10/06

Certificate of Service

I hereby certify that this document, filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on March 10, 2006.

/s/ Sandra S. Bower
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